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is our business.

DOCKET FILE COPY ORIGINAL

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsitel@jsitel.com

June 25, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

ACCEPTED/FILED

JUN 25 2014

**Federal Communications Commission
Office of the Secretary**

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Wilkes Telephone & Electric Co.
Study Area Code 220394**

Dear Ms. Dortch:

On behalf of Wilkes Telephone & Electric Co. ("Wilkes"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Wilkes seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan and of outage reporting.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 013
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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June 25, 2014

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Federal Communications Commission
Office of the Secretary
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Washington, DC 20554

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JUN 25 2014

Federal Communications Commission
Office of the Secretary

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Wilkes Telephone & Electric Co.
Study Area Code 220394
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Wilkes Telephone & Electric Co. (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")⁴ and must also report outages, both of which are contained in attachments to the 2014 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

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Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Company's outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

<010> Study Area Code 220394
<015> Study Area Name WILKES TEL & ELC CO
<020> Program Year 2015
<030> Contact Name: Person USAC should contact with questions about this data Jayne B. Callaway
<035> Contact Telephone Number: 7066789531 ext. Number of the person identified in data line <030>
<039> Contact Email Address: jbcallaway@nu-z.net Email of the person identified in data line <030>

ACCEPTED/FILED
JUN 25 2014Federal Communications Commission
Office of the Secretary

ANNUAL REPORTING FOR ALL CARRIERS

54,313 Completion Required
54,422 Completion Required

(check box when complete)

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	7 220394ga310.pdf	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	<input type="text"/> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	7	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	220394ga330.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)			
<410>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	220394ga510.pdf (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	220394ga610.pdf (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	<input type="text"/> (attach descriptive document)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	<input type="text"/> (complete attached worksheet)		<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000> (check to indicate certification)
<2005> (complete attached worksheet)

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000> (check to indicate certification)
<3005> (complete attached worksheet)

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

220394ga112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

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(200) Service Outage Reporting (Voice)

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

[illegible]

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(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 220394

<015>	Study Area Name	WILKES TEL & ELC CO
-------	-----------------	---------------------

<020>	Program Year	2015
-------	--------------	------

<030> Contact Name - Person USAC should contact regarding this data Jayne B. Callaway

<035> Contact Telephone Number - Number of person identified in data line <030> 7066789531 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> jbcallaway@nu-z.net

<701> Residential Local Service Charge Effective Date

1/1/2014

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

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(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-2.net

[illegible]

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(800) Operating Companies
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net
<810>	Reporting Carrier	Wilkes Telephone & Electric Company
<811>	Holding Company	Dycom Holdings, Inc.
<812>	Operating Company	Wilkes Telephone & Electric Company

[illegible]

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(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-2.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

[illegible]

REDACTED FOR PUBLIC INSPECTION

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers

Lifeline

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

220394gal210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

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(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
 <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

☐
☐

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Certification
 <2013> 2014 Frozen Support Certification
 <2014> 2015 Frozen Support Certification
 <2015> 2016 and future Frozen Support Certification

☐
☐
☐
☐

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

☐

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification
 <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐
☐
☐
☐

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0985/QMB Control No. 3060-0819

July 2013

<010>	Study Area Code	220394
<015>	Study Area Name	WILKES TEL & ELC CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan
Milestone Certification (47 CFR § 54.313(f)(1)(i))

Name of Attached Document Listing Required Information

(3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

(3014) If yes, does your company file the RUS annual report

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

☒

(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

220394ga3017.pdf

Name of Attached Document Listing Required Information

(3018) If the response is no on line 3014, Is your company audited?

(Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

(3023) Underlying information subjected to a review by an independent certified public accountant

☐

(3024) Underlying information subjected to an officer certification.

☐

(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

(3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

REDACTED FOR PUBLIC INSPECTION

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	220394
<015> Study Area Name	WILKES TEL & ELC CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035> Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	220394
<015> Study Area Name	WILKES TEL & ELC CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
<035> Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	WILKES TEL & ELC CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/23/2014
Printed name of Authorized Officer:	George Dyson
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	7066789544 ext.
Study Area Code of Reporting Carrier:	220394 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	WILKES TEL & ELC CO
Name of Authorized Agent or Employee of Agent:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/23/2014
Printed name of Authorized Agent or Employee of Agent:	Lans Chase
Title or position of Authorized Agent or Employee of Agent:	Staff Director - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	7705692105 ext.1
Study Area Code of Reporting Carrier:	220394 Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

WILKES TELEPHONE & ELECTRIC CO. (SAC 220394)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

REDACTED FOR PUBLIC INSPECTION

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 220394

<015>	Study Area Name	WILKES TEL & ELC CO
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<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Jayne B. Callaway
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<035>	Contact Telephone Number - Number of person identified in data line <030>	7066789531 ext.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jbcallaway@nu-z.net
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<220>

<a> <b1> <b2> <b3> <b4> <c1> <c2> <d> <e> <f> <g> <h>

[illegible]

UNFULFILLED SERVICE REQUEST(S)

VOICE/DATA REQUESTS- THESE WILL ALSO HAVE ACCESS TO VIDEO RF SERVICE

IN THE 2013 FORM 481 FILING WILKES REPORTED THAT WE HAD UNMET UNFULFILLED SERVICE REQUESTS IN LINCOLN COUNTY GEORGIA- DUE TO THE COSTS WILKES FELT WE WERE NOT ABLE TO SATISFY THIS REQUEST- WE SUCCESSFULLY SECURED BIP STIMULUS FUNDING GRANT 70/LOAN 30% AND WE HAVE BEEN ABLE TO NOT ONLY BUILD TO THE ONE CUSTOMER NEEDED BROADBAND (SHE WORKS FROM HOME AND WAS NOT ABLE TO OBTAIN STABLE BROADBAND SUPPORT FROM A WIRELESS CARRIER) BUT WE HAVE USED THIS PROJECT TO REACH SEVEN SUBSCRIBERS AT NINE DIFFERENT LOCATIONS WITHIN THIS SERVICE AREA –REMOTE WITHIN LINCOLN COUNTY GEORGIA

WILKES HAD PRICED THE ORIGINAL BID AT \$255,724.83 WHICH FOR ONE SUBSCRIBER WE FELT WAS NOT JUSTIFIED- WITH REACHING OUT TO MORE WITHIN THE SAME FOOTPRINT- WE HAVE SUCCESSFULLY BUILT FIBER PLANT TO THESE NINE SITES WHICH WILL SERVICE END USERS WITH VOICE (E911) AND BROADBAND SPEEDS WILL BE AVAILABLE TO A 100 DOWN/50 UPLOAD SPEED OPTION

SEVEN OF THE SUBSCRIBER LOCATIONS ARE RESIDENTIAL AND TWO ARE BUSINESS ADDRESS LOCATIONS

BY NEGOTIATING WITH CONTRACTORS AND BIDDING OUT THE PROJECT WILKES WAS ABLE TO SECURE PROJECT COSTS AT

\$432,448.02. BECAUSE MAINLINE WAS THE PRIMARY INVESTMENT- FOR ONE SUBSCRIBER- THE ORIGINAL BID PRICE FOR REACHING THE SINGLE SUBSCRIBER AT \$255,724.83 WAS NOT FEASIBLE, BUT WITH THE OUTREACH MEASURES OF WILKES TO SECURE OTHER SUBSCRIBER COMMITMENTS TO PURCHASE VOICE, INTERNET AND VIDEO- WE WERE ABLE TO BUILD MAINLINE FIBER TO MORE SUBSCRIBERS AND TO MEET THE REQUEST OF THE ORIGINAL SUBSCRIBER WHO CONTINUES TO NEED BROADBAND FOR HER HOME BASED BUSINESS

THE MAINLINE BUILD WAS COMPLETED IN MAY 2014- THE DROP PLACEMENT TO THE NINE LOCATIONS WAS COMPLETED, FRIDAY, JUNE 3RD. SERVICE CONNECTIVITY WILL BE COMPLETED TO THESE SUBSCRIBERS BY JULY 9TH, 2014 ALLOWING WILKES TO NO ONLY SERVICE THESE UNMET END USER REQUESTS BUT TO EARN REVENUES ON THESE PLANT LOCATIONS.

THESE SUBSCRIBERS WERE IN A REMOTE RURAL AREA WITH LITTLE TO NO E911 ACCESS VIA WIRELESS AS THE WIRELESS SERVICE DOES NOT FUNCTION WELL WITHIN THEIR SERVICE AREA.

WILKES FELT WE WOULD NOT BE ABLE TO AFFORDABLY PLACE THIS PLANT WITHOUT THE BIP FUNDED OPTION

Providence Ferry drop contacts

- 1) Steve Giella 1067 Maiden Cane cell 912-661-0769**
- 2) Murray Creek Equestrian Center (Steve Giella) barn- cell 912-661-0769**
- 3) Murray Creek Equestrian Center (Steve Giella) home- cell 912-661-0769**
- 4) Craig & Jeannie Linkous 1017 Petersburg Trace cell- 706-255-6851, 706-357-7236**
- 5) Dale & Connie Derham 1147 Maiden Cane Way 770-889-4062**
- 6) John & Nancy Kimball 1063 Petersburg Trace 571-237-6162 & 703-407-1317**
- 7) James Leonard & Lori Martinez 1142 Westwind Harbor 404-395-8956**
- 8) Scott & Cindy Coggins 1000 Lighthouse Pointe 404-861-9154**
- 9) Tommy & Kris McNeese 1258 Lighthouse Point 770-617-7424**



ENGINEERING ASSOCIATES, INC.
Communications Engineers

November 8, 2013

Mr. George A. Dyson
President
Wilkes Telephone & Electric Company
11 Court Street
Washington, Georgia 30673

RE: GA1106-A40 Wilkes Telephone & Electric Company
RUS Contract Form 515
Lincolnton Exchange Providence Ferry

Dear Mr. Dyson:

Enclosed for your review and approval are three copies of the proposed RUS Form 515 Contract between GA1106-A40 Wilkes Telephone & Electric Company and Globe Communications, LLC.. This contract is dated November 1, 2013 and is an outside plant contract for your American Recovery and Reinvestment Act of 2009 (ARRA) Broadband Initiatives Program (BIP) Loan/Grant. This contract is for construction of Fiber Optic Cable and Fiber Optic Service Entrances for Lincolnton Exchange Providence Ferry.

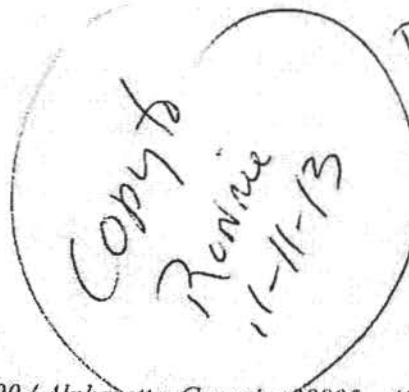
If everything meets with your approval, please sign Page 145 in each copy of the contract with Secretary attesting signature and corporate seal affixed. Also, please sign the Contract Rider, Pages 3, 12, Page 15 of the Davis-Bacon ACT RUS Form 515 Addendum and Page 19B in each copy of the contract. These executed contracts should then be forwarded to the RU General Field Representative, Mr. Andrew E. Hayes, for review and RU approval.

Also, please forward one copy of the executed Contract Rider, Pages 3, 12, 19B, 145 and Davis Bacon Addendum Page 15 to our office for our files.

If there are any questions, please call.

Yours truly,
Engineering Associates, Inc.

Michael E. Chambers



11/11/13
Providence Ferry
went to
Andy

\$ 432,448.02

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